

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

SHATANYA WARD,

Plaintiff,

V.

UNIFUND CCR PARTNERS,

Defendant.

CASE NO.: 06-CV-415

## **DEFENDANT'S INITIAL DISCLOSURES**

Unifund CCR Partners (the “Defendant”) makes the following initial disclosures pursuant to Rule 26 of the Federal Rules of Civil Procedure:

A. The Defendant believes the following persons may have discoverable information regarding the matters relevant to the Defendant's defenses in this lawsuit:

Patricia L. Baxter, Esq.  
General Counsel  
Unifund CCR Partners  
10625 Techwoods Circle  
Cincinnati, Ohio 45242

Angela Freckman  
Legal Liaison  
Unifund CCR Partners  
10625 Techwoods Circle  
Cincinnati, Ohio 45242

B. The Defendant will make available for review any documents it has in its possession, custody or control that may be used to support its contentions with respect to any significant factual issue in the case, to the extent it has not already produced such documents. These documents include, but are not limited to:

1. Credit Reports.
2. Account Statements.
3. Payment Histories.
4. Affidavits from the Defendant's predecessor in interest, Citicorp Credit Services, Inc.
5. Reports evidencing the timing and amount of payments from the Plaintiff.

C. The Defendant is not seeking any damages at this time. The Defendant reserves all rights, claims and defenses in this adversary proceeding, and will supplement this disclosure if it subsequently seeks damages in this adversary proceeding.

D. The Defendant does not believe that there will be an insurance agreement in which any person carrying on an insurance business may be liable to satisfy part or all of a judgment that may be entered in the adversary proceeding.

The Defendant hereby gives notice that it intends to rely upon such other supplemental disclosures that may become available or apparent during the course of discovery and thus reserves the right to amend its Initial Disclosures accordingly.

Respectfully submitted this the 28<sup>th</sup> day of August, 2006.

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/s/ Chris Hawkins

Chris Hawkins

**BRADLEY ARANT ROSE & WHITE LLP**

One Federal Place

1819 Fifth Avenue North

Birmingham, Alabama 35203-2104

Telephone: (205) 521-8000

Facsimile: (205) 521-8500

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies this 28<sup>th</sup> day of August, 2006, that a copy of the foregoing was delivered via ECF electronic filing or via United States Mail, postage prepaid, to the following:

David G. Poston  
Brock & Stout  
P. O. Drawer 311167  
Enterprise, Alabama 36331

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/s/ Chris Hawkins  
Chris Hawkins